

## Victor Essen

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**From:** Martina Bernstein <MartinaB@petaf.org>  
**Sent:** Friday, January 18, 2019 2:01 PM  
**To:** Victor Essen  
**Cc:** Debbie Champion; Jared Goodman; Martina Bernstein  
**Subject:** [EXTERNAL] RE: MPF Rule 30(b)(6) deposition/Casey's upcoming motion for protective order

Victor:

This confirms that you represented to us the following: (1) The only witness available or competent to testify about the topics identified in MPF's Rule 30(b)(6) deposition is Connie Casey (Casey); (2) Casey will not make herself available to testify about those topics on behalf of MPF; (3) Casey will file a motion for a protective order; and (4) although no such motion has yet been filed, in order not to incur unnecessary expenses, we will not make travel arrangements for the Rule 30(b)(6) deposition, in reliance on your representation that a motion for a protective order will be filed, and the deposition will not take place as noticed.

Martina Bernstein  
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**From:** Victor Essen <vessen@rssclaw.com>  
**Sent:** Friday, January 18, 2019 9:55 AM  
**To:** Martina Bernstein <MartinaB@petaf.org>  
**Cc:** Debbie Champion <dchampion@rssclaw.com>; Jared Goodman <JaredG@PetaF.org>  
**Subject:** RE: MPF Rule 30(b)(6) deposition

We have discussed this internally at some length. I believe we will be filing the motion protective order as we previously suggested. I believe we will need to confer about that before we file, so let me know when you all are available.

Vic

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**From:** Martina Bernstein [<mailto:MartinaB@petaf.org>]  
**Sent:** Thursday, January 17, 2019 8:13 AM  
**To:** Victor Essen  
**Cc:** Debbie Champion; Jared Goodman; Martina Bernstein  
**Subject:** [EXTERNAL] MPF Rule 30(b)(6) deposition

Hi Victor:

With the Rule 30(b)(6) deposition of MPF quickly approaching, I need to make arrangements for my scheduling and travel plans. You previously indicated that Casey might file a motion for a protective order to prevent the deposition but we have not heard anything from you about this since. Can you kindly provide an update as to whether, as far as you know, the deposition will proceed as noticed?

Thank you for your courtesy.

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Senior Litigation Counsel

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